

FILED

MAY 17 2017

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
CAPE GIRARDEAU

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
Southeastern DIVISION

Brown Beatrix Jaynes

(Enter above the full name of the Plaintiff[s]
in this action.)

- vs -

Southeast Health Hospital,

Kevin Callahan, CRNA,

Meza Sterling, MD., and

Wendelly Vasquez, MD

(Enter above the full name of ALL Defend-
ant[s] in this action. Fed. R. Civ. P. 10(a)
requires that the caption of the complaint
include the names of all the parties. Merely
listing one party and "et al." is insufficient.
Please attach additional sheets if necessary.

Case No. 1:17-CV-59 ACL
(To be assigned by Clerk
of District Court)

COMPLAINT

- I. State the grounds for filing this case in Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Dr. Wendelly Vasquez moved to the State of Florida to Practice OB-Gyn there. In my medical records, Kevin Callahan stated that he did his duties under the Direction of Dr. Wendelly Vasquez, OB-Gyn. His direct superior who oversees his actions was Dr. Meza Sterling, MD. Both Kevin and Meza may live outside of State or since changed workplaces, Plaintiff doesn't know how to go about finding addresses.

- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

On April 15, 2015, I went to Southeast Health Hospital for a routine ultrasound. Based on the findings, my OB/GYN, Wendelly Vasquez decided to admit me and induce me to have my baby, originally due May 4, 2015. Upon induction and having very mild contractions, the doctor told me that I needed to have a C-Section because my baby couldn't handle the stress. The first C-Section time was given to me of 9:00pm. because I had already eaten and that put me at an increased risk of aspiration? I could die by Choking on my own vomit. Thirty to forty five minutes later I was told I needed to go in ^{right then} ~~now~~ and deal with the risk because my fetus was in ~~greater~~ risk. I was told they would try to get a spinal block and if it wasn't successful I would have to be put under full anesthesia and her father wouldn't be allowed in with me. After many spinal attempts, (I stopped counting after 7 misses where intense pain would shoot down either side of me from the point of needle entry into my spine all the way to the tips of my toes.) I asked if I could sit with my legs to one side of the table instead of straddling it, I mentioned I felt Crooked at least twice but Kevin continued, asking if I had been told I have scoliosis before, answering "No," I was thinking of different, better ways to get through the process successfully. Before any patient can receive any type of anesthesia, they must watch an informational video. Each patient in the video had both legs over one side of either a bed or table, none straddled the table or bed. Other nurses were present along with on looking students, and my doctor held me in a hug in an effort to comfort and calm me. My medical records only show two attempts? Stated the second unsuccessful. My records weren't correct. I also became addicted to opiates since discharge? in therapy now.

V. Relief: State briefly and exactly what you want the Court to do for you.

lifetime income because I'm unable to work adequately and comfortably because of injury and medications to try to make day-to-day life tolerable and/or punitive/monetary damages.
Also make a "PSA"-type announcement to other people in Anesthesia field so no one else will be subjected to the pain and suffering ~~that I was~~ that I was. Learning to one side is better and less likely to have patient "lop-sided" on bed or table, in my actual observed opinion.

VI. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒

NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

\$10,000,000.00 or as the Court Deems necessary. My injuries may not be irreversible, and for pain and suffering. My condition has not improved, only seems to stay constant, sometimes getting worse with little activity. My quality of life is greatly decreased.

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES ☐

NO ☒

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 17th day of May, 2017

Ronell B. Jaynes

Signature of Plaintiff(s)